

# Federal Defenders OF NEW YORK, INC.

Southern District  
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David E. Patton  
Executive Director  
and Attorney-in-Chief

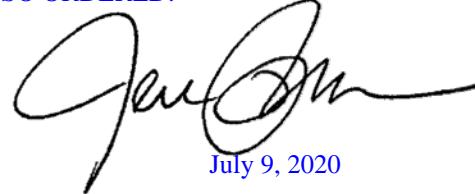
Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

July 9, 2020

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
40 Foley Square  
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to terminate  
ECF No. 17. SO ORDERED.



July 9, 2020

RE: **United States v. Ruvioldy Cruz**  
**20 Cr. 196 (JMF)**

Dear Judge Furman:

I write - with no objection from the government and no objection from Pretrial Services - to respectfully request that the Court modify Mr. Cruz's bail conditions to remove the current condition of home incarceration and instead impose the condition of home detention with electronic monitoring.

On January 9, 2020, the Honorable Judge Debra Freeman imposed the following bail conditions, *inter alia*: A \$50,000 personal recognizance bond co-signed by two financially responsible persons; travel restricted to SDNY/EDNY; surrender of travel documents and no new applications; home incarceration with electronic monitoring, and strict pretrial supervision.

In the past six months since his release, Mr. Cruz has been fully compliant with the conditions of his bail and has demonstrated his commitment to abiding by the rules of supervision. We request this bail modification because it would benefit Mr. Cruz's post-release transition to be able to seek employment and get physical exercise outside (with prior approval from Pretrial Services). Assistant U.S. Attorney Mitzi Steiner and Pretrial Services Officer John Moscato do not object to Mr. Cruz's request. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Mark Gombiner  
Mark Gombiner, Esq.  
Assistant Federal Defender  
(212) 417-8718

**SO ORDERED:**

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**HONORABLE JESSE M. FURMAN**  
**UNITED STATES DISTRICT JUDGE**

cc: AUSA Mitzi Steiner (by ECF)